

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
Charleston Division**

**ALISHA KINGERY,
f/k/a ALISHA WILKES,
individually and on behalf of all
others similarly situated,**

Plaintiffs,

v.

Civil Action No. 2:12-cv-1353

QUICKEN LOANS, INC.,

Defendant.

DEFENDANT'S MOTION TO LIMIT DEPOSITION AND FOR PROTECTIVE ORDER

Defendant Quicken Loans, Inc. ("Quicken Loans"), by counsel, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure and Local Rule 26.4, hereby moves to limit the deposition and for a Protective Order concerning some of the topics Plaintiff has identified in her Rule 30(b)(6) Deposition Notice served on November 19, 2013. For the reasons set forth in the accompanying memorandum of law, the Court should enter a Protective Order prohibiting Plaintiff from: (a) seeking testimony on the number of individuals in the purported class because Quicken Loans has stipulated to numerosity; (b) seeking impermissible contention testimony; and (c) seeking testimony that is irrelevant, overly broad, and unduly burdensome.

Defendant certifies that in compliance with Federal Rule 26(c) and Local Rule 37.1(b) that it has attempted in good faith to resolve the discovery matters at issue and to confer with Plaintiff to resolve this Motion without the necessity of Court involvement.

WHEREFORE, Defendant Quicken Loans, Inc. by counsel, respectfully requests that the Court enter an Order: (1) granting its Motion to Limit Deposition and for Protective Order; (2)

granting it the relief requested in its accompanying memorandum in support; and (3) granting it such further relief as the Court deems appropriate.

Dated: December 3, 2013

Respectfully Submitted,

QUICKEN LOANS, INC.

By: /s/ John C. Lynch
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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